

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

V.

BRANDON KIDDER

Defendant

**AFFIDAVIT IN SUPPORT
OF RULE 12.2 NOTICE
OF AN INSANITY DEFENSE**
Case No. 20-mj-1010

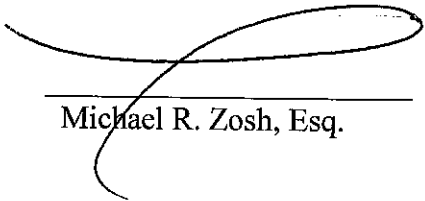
I Michael R. Zosh, Esq. authorized to appear in the United States District Court Western District of New York and have been retained to represent the Defendant, Brandon Kidder, in the criminal matter now before the Court. I, Michael R. Zosh, being duly sworn, depose and say:

1. I am familiar with the charges against the Defendant and based on my conversations with the Defendant and his family we are requesting the Court order the Defendant to a Competency examination under 18 U.S.C. 4221.

2. Additionally, the Defendant is providing notice of an intent to argue an insanity defense and pursuant to Rule 12.2(a) put the government on notice.

3. The Defendant does not have an expert at this time but it is our position that the mental examination discussed at the last Court proceeding should include that the defense intends to assert a defense of insanity at the time of the alleged offenses contained in the criminal complaint.

DATED: Akron, New York
13 March 2020


Michael R. Zosh, Esq.

Sworn and Subscribed to before me
On this 13th Day of March 2020.


Notary Public

Karen M. Foley
Notary Public, State of New York
Qualified in Erie County
My Commission Expires May 11, 2023